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February 5, 2025

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) to request that the Court set a deadline of February 28, 2025 for any responses to the objections that the parties filed this past Friday, January 31, under Federal Rule of Civil Procedure 72(a). *See* ECF Nos. 10691, 10693.

Rule 72(a) sets a 14-day deadline for objections to a non-dispositive order but does not set a date for responses to objections. In this instance, the Court’s order issued on December 11, 2024, and Plaintiffs’ original due date was December 24. Plaintiffs sought and obtained an extension to January 31, 2025, to which Saudi Arabia did not object. Plaintiffs then filed a 25-page set of objections; Saudi Arabia filed a 3-page set of objections. The January 31 deadline allowed a total of 51 calendar days (including the end-of-year holidays) for objections. Saudi Arabia’s requested February 28 deadline would allow a total of 28 calendar days for responses. Accordingly, the request is reasonable and proportionate.

Plaintiffs have asked that this letter state their position as follows:

Plaintiffs note that both parties were afforded the same, extended period to file Rule 72 objections due to travel and holiday plans. In contrast, KSA has offered no justification for a four-week filing deadline for responses, and Plaintiffs do not believe that such an extension (until February 28) is necessary or warranted.

Plaintiffs nonetheless defer the matter to the discretion of the Court. In the event that a deadline of February 28 is set for responses, Plaintiffs would request that the deadline for reply briefs be set for March 14, 2025.

Saudi Arabia does not object to Plaintiffs’ request as to reply briefs.

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As the Court is aware from previous letters, the parties have contested whether leave of Court is required for a response to Rule 72(a) objections, and it is Saudi Arabia's position that no leave is required. *See* ECF No. 4753, at 1-2 & n.\*. To the extent necessary, Saudi Arabia respectfully requests leave to file its response.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)